

assess the 'Range to No More Than 1 Hazardous Fragment per 600 square feet' option. Moreover, the 37 mm projectile has an internal fuse and must be considered 'fuzed' under normal USACE procedures; hence the identification of 'fuzed' in the MPR map.

The USACE, Ordnance and Explosive Design Center, Structural Branch (CEHNC-ED-CS-S) employed 'latest available information' and professional judgment to classify the MPW of a 37 mm projectile and 60 mm mortar as 'un-armed'. The justification to assign this classification is based on:

- (a) The item likely originated from a demolition pit and under normal demolition procedures the item would have to be 'un-armed' in order to allow movement of the item to a demolition pit location; and
- (b) The lack of historical records to indicate live fire (i.e. range activity) ever occurred at the Benicia Arsenal.

The USACE acknowledges that information about the 60 mm mortar round indicated that it was a high explosive (HE). USACE also confirms the 60 mm mortar HE was used as the MPW for Sector 3a.

Note: See Attachment (A) and (B) and reference (a) for a detailed description of the relationship between 'Maximum Fragment Range', 'Range to No More Than 1 Hazardous Fragment per 600 square feet', 'Range to 0.9 psi overpressure' and 'K328 overpressure distance'.

8. Page 1: Under the Summary: section; paragraph 5. Please refer to the Imminent and/or Substantial Endangerment Determination and Remedial Action Order issued by DTSC for the Tourtelot Property on June 1, 1999. The United States Department of the Army is jointly and severally responsible for carrying out all actions required by the order. The CESPK has been attending project meetings, providing technical direction and acting as the official representative of the United States Department of the Army on all aspects of the Tourtelot project. In this capacity CESPK has assumed a much broader scope of responsibility in the Tourtelot matter than just advisor to the City of Benicia. This responsibility includes, but is not limited to the safety of personnel working at the site and public safety of area residents.

Response: A question or comment was not provided. If the reviewer intended to pose a question or comment please revise